

EXHIBIT A

quinn emanuel trial lawyers | washington, dc

1300 I Street NW, Suite 900, Washington, District of Columbia 20005-3314 | TEL (202) 538-8000 FAX (202) 538-8100

WRITER'S DIRECT DIAL NO.
(202) 538-8330

WRITER'S EMAIL ADDRESS
aviperry@quinnemanuel.com

October 14, 2024

Celia Cohen
Andrew Rohrbach
Hagan Scotten
Derek Wikstrom
Assistant U.S. Attorneys

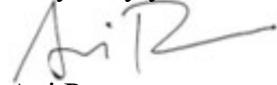
Re: *United States v. Eric Adams*, 24 Cr. 556 (DEH)

Dear Counsel,

Due process requires that disclosure of exculpatory and impeachment evidence be made in sufficient time to permit the defendant to make effective use of that information at trial. *See, e.g.*, *United States v. Coppa*, 267 F.3d 132, 144 (2d Cir. 2001). As you know, Mayor Adams is exercising his right to a speedy trial and has requested a trial date as soon as February 2025. For that reason, Mayor Adams requires all *Brady* and *Giglio* material now, so that he can investigate and prepare for trial effectively. A disclosure closer to trial will not be “timely”—as required by the Constitution, relevant caselaw, Judge Ho’s Standing Order, and the Justice Manual—and will prejudice the Mayor’s ability to make effective use of the information at trial.

Accordingly, we request the immediate production of all *Brady* and *Giglio* material without limitation. Moreover, while Mayor Adams has no obligation to identify specific *Brady* or *Giglio* material that is subject to disclosure, we specifically request (1) final copies of all agreements between Rana Abbasova and the government; (2) any draft agreements exchanged between the government and Ms. Abbasova (including through her counsel); (3) the substance of any other communications between the government and Ms. Abbasova (including through her counsel); and (4) all evidence showing that Mayor Adams, directly or indirectly, was responsible for reporting Ms. Abbasova to the New York City Department of Investigation.

Very truly yours,



Avi Perry

cc: William Burck
Alex Spiro
John Bash

quinn emanuel urquhart & sullivan, llp

ABU DHABI | ATLANTA | AUSTIN | BEIJING | BERLIN | BOSTON | BRUSSELS | CHICAGO | DALLAS | DOHA | HAMBURG | HONG KONG | HOUSTON | LONDON | LOS ANGELES | MANNHEIM | MIAMI | MUNICH | NEUILLY-LA DEFENSE | NEW YORK | PARIS | PERTH | RIYADH | SALT LAKE CITY | SAN FRANCISCO | SEATTLE | SHANGHAI | SILICON VALLEY | SINGAPORE | STUTTGART | SYDNEY | TOKYO | WASHINGTON, DC | WILMINGTON | ZURICH